As an amateur radio operator, I am vehemently opposed to granting permission for Broadband over Power Lines (BPL). The American Public Power Association (APPA) states; "the burden should be imposed on challengers to BPL to demonstrate interference in a fact-based, empirical proof." Contrary to the position of the APPA, I feel the burden should squarely be shouldered by the corporations intending to profit from BPL. The APPA further states, "to the extent that interference is demonstrated, there should be an attempt to accommodate BPL, even if it means that existing communications providers may have to share or transfer bandwidth." This is a severely narrow view of responsibility by the APPA, and admits an expectation that interference will be generated.

As an amateur radio operator, these federally licensed individuals have invested large personal sums of money to build a capability for communication, which could be pressed into service immediately in the event of a local or national emergency. Our amateur radio service provides a pool of trained and willing volunteers ready to respond to the call to duty. Without a doubt, as has been demonstrated numerous times, the amateur radio emergency service (ARES) will be called to service during times of national or local distress. If the radio spectrum that we now enjoy were to become polluted with leakage from this service, it will render our equipment and preparation useless. This causes a serious and negative impact to a key resource for the Home Land Security plan.

There are a number of options for broadband internet connections including DSL delivered over phone lines, broadband provided by cable companies, or internet delivered by satellite. Clearly, the APPA is looking for ways to expand into other markets and services. While it is natural for a telephone or cable company to endeavor to deliver these communications services because that is their business, the power companies are not well established to provide this.

Cable companies distribute and deliver their service over coaxial cables, which are inherently shielded from leakage. Phone companies transmit their services largely over fiber optic networks, which precludes the possibility of radiation over large areas. The power companies on the other hand have extensive networks of power distribution lines which will act as antennae in the High Frequency portion of the radio spectrum. This will undoubtedly result in an overall increase of the noise floor in this portion of the radio spectrum, which is enjoyed and depended on by the amateur radio service. I would also envision localized areas where communications are rendered useless because of BPL.

It is requested that the Federal Communications Commission take no steps to allow or encourage the APPA's plan to deploy BPL.

Respectfully,

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